REMARKS

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-13, 23-24, 35, and 39-56 are presently pending. Claims amended herein are none. Claims withdrawn or cancelled herein are none. New claims added herein are none.

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Substantive Claim Rejections

Claim Rejections under § 103

The Office rejects all of the pending claims under §103. For the reasons set forth below, Applicant respectfully submits that the Office has failed to state a *prima facie* case of obviousness. Accordingly, Applicant respectfully requests that the rejections be withdrawn and the case be passed along to issuance.

The Office rejected all claims in the current Application, stating that the claims were unpatentable under USC § 103(a) over the combination of the following references:

- **Pstruh.cz:** *Pstruh.cz*, dated October 13, 1999; and
- **Smith:** *Smith*, US Patent No. 6,018,748 (issued 1/25/00)

Applicant respectfully submits that these rejections are inappropriate for two reasons: (1) because **Pstruh.cz** does not teach the element that the Office cites the reference as teaching, and (2) because **Smith** does not teach the element that the Office cites the reference as teaching.

CITED REFERENCES

Pstruh.cz

Pstruh.cz describes a URL Replacer Software that can be downloaded from the website www.pstruh.cz. According to **Pstruh.cz**, "[t]he ISAPI filter replaces defined parts of URL from browser. It enables url to scripts (.asp, .cgi, .dc) with parameters look like static html pages or specify exact download filename generated by script." (*Pstruh.cz*, p. 1). According to the reference, the

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user is able to configure the replacer, so as to program exactly what portions of the web address should be deleted and exactly what the deleted portion should be replaced with. For example, **Pstruh.cz** gives the following sample configuration and the resulting replacement:

Current replacements

	Find what	Replace with
Delete	/?	/default.asp?
Delete	.asp/	.asp?
Delete	xhtml	.asp?

This configuration enables replace
http://www.server.com/any.asp/name1=value1/name2=value2/name3=value3/file.htm
...
to
http://www.server.com/any.asp?name1=value1&name2=value2&name3=value3&file.htm

Id. Therefore, when the user attempts to access the URL: http://www.server.com/any.asp/name1=value1/name2=value2/name3=value3/file.htm, the user instead is directed to the following URL: http://www.server.com/any.asp?name1=value1&name2=value2&name3=value3&file.htm. Furthermore, in the parent case's Action, the Office aptly states that "**Pstruh.cz** does not teach generating an instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page."

Smith

Smith describes a method and apparatus for creating and displaying dynamic link labels in a browser program operating on a remote user station. The

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link labels are created in an application program which can be run within the browser, and the link labels are designed to operate in a similar manner as HTML hyper links. *The link labels can also dynamically change in response to user input into the browser.* (*Smith*, abstract) (emphasis added). **Smith** is more easily understood with reference to Figs. 3A-3C, depicted below:

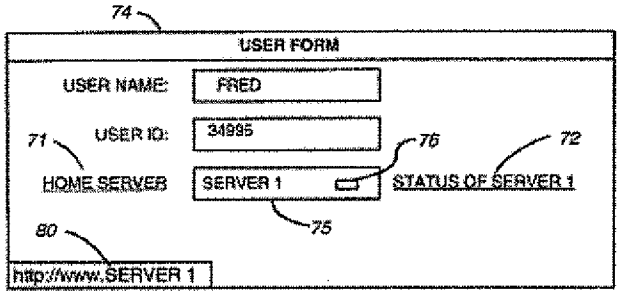


Fig. 3A

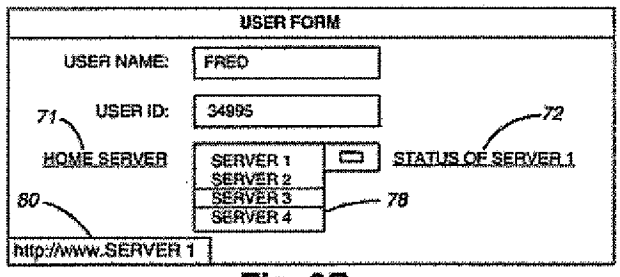


Fig. 3B

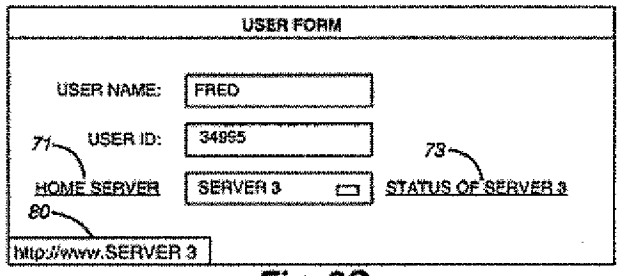


Fig. 3C

Figs. 3A-3C illustrate examples of browser pages 74 of the **Smith** disclosure. The page 74 has a link label 71 of "HOME SERVER" with an associated data field 75 within a pull-down menu 76. Link label 72 "STATUS OF SERVER 1" is also displayed on page 74. The browser displays URL status in

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block 80, which indicates the URL associated with a link label presently selected by the user. Link labels 71 and 72 of Fig. 3A have *dynamic characteristics* and can be made to respond to user input into the browser window. (*Smith*, col. 5, lines 24-39) (emphasis added).

In Fig. 3A, link label 71 indicates the HOME SERVER of the user Fred and link label 71 has a URL address associated with SERVER 1, shown in block 80. However, the user may access the pull-down menu 76 and choose SERVER 3, as shown in Fig. 3C. At this point, *the URL corresponding to HOME SERVER link label 71 would be updated to reflect the address of SERVER 3, as shown in block 80*. (*Smith*, col. 5, lines 41-52) (emphasis added). In sum, **Smith** describes creating link labels within a web browser, wherein the URL addresses are able to change due to user input.

Obviousness Rejections

Applicant respectfully submits that the rejection would be inappropriate as applied to the present application for two reasons: (1) because **Pstruh.cz** does not teach or suggest the element that the Office cites the reference as teaching, and (2) because **Smith** does not teach or suggest the element that the Office cites the reference as teaching.

Claim 1

Claim 1 recites a spider-friendly Web page generation method comprising (emphasis added):

- generating an instance of a main Web page having at least one link with a ***dynamic address*** pointing to a ***dynamic Web page***; and

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- converting the dynamic address into a static address ***that also points to the dynamic Web page***.

In making out a rejection of claim 1, the Office first cites **Pstruh.cz** as teaching "converting the dynamic address into a static address that also points to the dynamic Web page." The Office concedes that **Pstruh.cz** does not teach teaching "generating an instance of a main instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page," although the Office then cites **Smith** as teaching this element. Finally, the Office states that it would have been obvious to combine these teachings to produce an "efficient system". (*Office Action of 9/21/05*, p. 3).

Applicant respectfully submits that **Pstruh.cz** does not teach "converting the dynamic address into a static address that also points to the dynamic Web page," as asserted by the Office. Instead, the reference teaches a configure-able URL replacer. The replacer can be configured so as to program exactly what portions of a web address should be *deleted* and exactly what the deleted portion should be *replaced with.* As shown above, therefore, the reference describes a sample configuration where a static address can be replaced with a dynamic address. Again, the example used above would make the following replacement:

> http://www.server.com/any.asp/name1=value1/name2=value2/name3=value3/file.htm
> ...
> to
> http://www.server.com/any.asp?name1=value1&name2=value2&name3=value3&file.htm

(*Pstruh.cz*, p. 1). Because the user is able to configure the replacements, the user may also be able to replace a dynamic address with a static address (i.e.

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the opposite replacement of the above example). However, **Pstruh.cz** does not teach "converting the dynamic address into a static address *that also points to the dynamic Web page*." (emphasis added).

Instead, if a user configured the program to replace a dynamic address with a static address, the user would be *directed to the static address itself*. Because **Pstruh.cz** teaches a URL *replacer*, the user would simply access the static address, an address that *would not* "also point[] to the dynamic page." The address, instead, would not point anywhere, as the user would merely be directed to the static web page defined by the replaced URL. Therefore, **Pstruh.cz** does not teach "converting the dynamic address into a static address ***that also points to the dynamic Web page***" as recited in Applicant's claim 1. (emphasis added).

For this reason alone, Applicant submits that the obviousness rejection is improper because the combination of the teachings of **Pstruh.cz** and **Smith** fail to disclose all of the features and elements recited in Applicant's claims.

Furthermore, Applicant respectfully submits that the Office also incorrectly cites **Smith** as teaching "generating an instance of a main instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page."

Applicant submits that **Smith** does not teach "a dynamic address," but rather multiple static addresses that are able to *dynamically change* in response to user input. As shown above in Figs. 3A-3C, when the user chooses SERVER 1 from the pull-down menu, the resulting URL address for link 71 is http://www.SERVER1. However, when the user instead chooses SERVER 3 from the pull-down menu, the resulting URL address for link 71 is instead http://www.SERVER3. Applicant respectfully but strongly submits that both of

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these URL addresses are *static, not dynamic, addresses*. There is nothing in the foregoing addresses that characterize these addresses to the contrary. Accordingly, the Web page that the user is directed to (e.g. http://www.SERVER1 or http://www.SERVER3) is also a static Web page, rather than dynamic. A link that is able to ***dynamically change due to user input*** should not be confused with a "***dynamic address*** pointing to a ***dynamic Web page***." (emphasis added). Therefore, Applicant submits that **Smith** does not teach "generating an instance of a main instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page."

For this additional reason alone, Applicant submits that the obviousness rejection is improper because the combination of the teachings of **Pstruh.cz** and **Smith** fail to disclose all of the features and elements recited in Applicant's claim 1.

Claims 2-7

These claims ultimately depend upon independent claim 1. As discussed above, claim 1 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims as they all depend on an allowable claim.

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Claim 8

Claim 8 recites a static to dynamic (S-to-D) Web address conversion method comprising (emphasis added):

- receiving a request for a dynamic Web page, the request including a static address ***pointing to the dynamic Web page***; and
- converting the static address to a dynamic address ***also pointing to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruh.cz** does not teach "converting the static address to a dynamic address *also pointing to the dynamic Web page*," while **Smith** does not teach "receiving a request for a dynamic Web page, the request including a static address *pointing to the dynamic Web page*." For at least this reasons, this claim is allowable.

Claims 9-13

These claims ultimately depend upon independent claim 8. As discussed above, claim 8 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant requests that the Office withdraw the rejection of each of these dependent claims as they all depend on an allowable claim.

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Claim 23

Claim 23 recites a dynamic to static (D-to-S) Web address conversion method comprising (emphasis added):

- receiving a ***dynamic address pointing to a dynamic Web page***; and
- converting the dynamic address to a static address ***also pointing to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruh.cz** does not teach "converting the dynamic address to a static address *also pointing to the dynamic Web page*," while **Smith** does not teach "receiving a *dynamic address pointing to a dynamic Web page*." For at least this reasons, this claim is allowable.

Claim 24

This claim ultimately depends upon independent claim 23. As discussed above, claim 23 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant requests that the Office withdraw the rejection of this dependent claim as it depends on an allowable claim.

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Claim 35

Claim 35 recites a method of providing a dynamic Web page comprising (emphasis added):

- receiving a request for a dynamic Web page from a computer on a network, the request including a ***static Web address pointing to the dynamic Web page***;
- generating an instance of the ***dynamic Web page*** such that contents of the instance appears as a static Web page; and
- sending the ***dynamic Web page*** to the computer.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruh.cz** does not teach "receiving a request for a dynamic Web page from a computer on a network, the request including a *static Web address pointing to the dynamic Web page*," while **Smith** does not teach "generating an instance of the *dynamic Web page* such that contents of the instance appears as a static Web page" nor "sending the *dynamic Web page* to the computer." For at least this reasons, this claim is allowable.

Claim 39

Claim 39 recites a computer-readable medium having stored thereon a data structure for use with a computer having a processor and a memory, said structure comprising a static Web address ***pointing to a dynamic Web page*** stored on the computer. (emphasis added).

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In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "said structure comprising a static Web address *pointing to a dynamic Web page*". For at least these reasons, this claim is allowable.

Claim 40

Claim 40 recites a computer-readable medium having stored thereon a data structure for use with a first computer having a processor and a memory, said structure comprising a static Web address ***pointing to a dynamic Web page***, wherein the dynamic Web page is stored on a second computer having a processor and a memory, the first and second computers being operatively coupled via a communications network. (emphasis added).

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "a static Web address *pointing to a dynamic Web page*". For at least these reasons, this claim is allowable.

Claim 41

Claim 41 recites a Web site system comprising (emphasis added):

- a Web server hosting a ***dynamic Web site***;

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- a database storing data used by the Web server to ***generate dynamic Web pages*** of the dynamic Web site, the database being operatively coupled to the Web site; and

- a static to dynamic (S-to-D) Web address converter, the converter being operatively coupled to the Web server;

- the S-to-D Web address converter being configured to convert a static address to a ***dynamic address pointing to a dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "a *dynamic Web site*," "a database storing data used by the Web server to *generate dynamic Web pages*," nor "the S-to-D Web address converter being configured to convert a static address to a *dynamic address pointing to a dynamic Web page*." For at least this reasons, this claim is allowable.

Claim 42

This claim recites a Web site system comprising (emphasis added):

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- Web server hosting a ***dynamic Web site***;
- a database storing data used by the Web server to ***generate dynamic Web pages*** of the dynamic Web site, the database being operatively coupled to the Web server; and
- a dynamic to static (D-to-S) Web address converter, the converter being operatively coupled to the Web server;
- the D-to-S Web address converter being configured to convert a dynamic address pointing to a dynamic Web page into a static address ***also pointing to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruh.cz** does not teach "the D-to-S Web address converter being configured to convert a dynamic address pointing to a dynamic Web page into a static address *also pointing to the dynamic Web page*". Furthermore, **Smith** does not teach "a *dynamic Web site*" nor "a database storing data used by the Web server to *generate dynamic Web pages*". For at least this reasons, this claim is allowable.

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Claim 43

This claim recites a server comprising (emphasis added):

- a processor;
- a request receiver executable on the processor to receive a request including a static address of a main Web page;
- a spider-friendly Web page generator executable on the processor to:
 - receive the static address of the main Web page from the request receiver;
 - in response to receiving the static address, generate an instance of the main Web page having at least one link with an ***address pointing to a dynamic Web page.***

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "generat[ing] an instance of the main Web page having at least one link with an *address pointing to a dynamic Web page* [in response to receiving the static address]". For at least this reasons, this claim is allowable.

Claim 44

This claim recites a server, comprising (emphasis added):

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- a processor;
- a static to dynamic (S-to-D) Web address converter executable on the processor to:
 - convert a ***static address pointing to a dynamic Web page*** into a dynamic address that also points to the dynamic Web page.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "a *static address pointing to a dynamic Web page*". For at least this reasons, this claim is allowable.

Claim 45

This claim recites a (emphasis added):

- a processor;
- a static to dynamic (S-to-D) Web address converter executable on the processor to:
 - parse a static address to identify at least one value associated with a field within the static address; and
 - generating a dynamic address incorporating at least one value associated with the field, wherein the ***dynamic address points to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to

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claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "wherein the *dynamic address points to the dynamic Web page*". For at least this reasons, this claim is allowable.

Claim 46

This claim recites a server comprising (emphasis added):

- a processor;
- a dynamic to static (D-to-S) Web address converter executable on the processor to:
 - convert a dynamic address pointing to a dynamic Web page into a static address ***also pointing to the dynamic Web page.***

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "a static address *also pointing to the dynamic Web page.*" For at least this reasons, this claim is allowable.

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Claim 47

This claim recites a system for hosting dynamic Web sites comprising (emphasis added):

- a Web server for dynamically generating an instance of a dynamic Web page; and
- a spider-friendly Web page generator configured to:
 - generate an instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page; and
 - convert the dynamic address into a static address that ***also points to the dynamic Web page.***

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruch.cz** does not teach "a static address *also pointing to the dynamic Web page*." For at least this reasons, this claim is allowable.

Claim 48

This claim recites a system for hosting dynamic Web sites comprising (emphasis added):

- a Web server for dynamically generating an instance of a dynamic Web page in response to a request; and
- a static to dynamic (S-to-D) Web address converter;

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- the Web server being configured to send a Web address of the request to the converter;
- the converter being configured to:
 - receive the Web address of the request;
 - determine if the Web address is a static address; and
 - convert the static address to a dynamic address that ***also points to the dynamic Web page.***

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruch.cz** does not teach "convert the static address to a dynamic address that *also points to the dynamic Web page.*" For at least this reasons, this claim is allowable.

Claim 49

This claim ultimately depends upon independent claim 48. As discussed above, claim 48 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant requests that the Office withdraw the rejection of this dependent claim as it depends on an allowable claim.

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Claim 50

This claim recites a system for hosting dynamic Web sites comprising (emphasis added):

- a Web server for dynamically generating an instance of a dynamic Web page; and
- a dynamic-to-static (D-to-S) Web address converter being configured to:
 - convert a dynamic address pointing to a dynamic Web page into a static address that ***also points to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Smith** does not teach "a static address *also points to the dynamic Web page*." For at least this reasons, this claim is allowable.

Claim 51

This claim ultimately depends upon independent claim 50. As discussed above, claim 50 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant requests that the Office withdraw the rejection of this dependent claim as it depends on an allowable claim.

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Claim 52

This claim recites a computer-readable storage medium having computer-executable instructions that, when executed by a computer, performs a spider-friendly Web page generation method comprising (emphasis added):

- generating an instance of a spider-friendly Web page having at least one link with a dynamic address pointing to a dynamic Web page; and

- converting the dynamic address into a ***static address that also points to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, neither **Smith** nor **Pstruh.cz** teach "a static address *also points to the dynamic Web page*." For at least this reasons, this claim is allowable.

Claim 53

This claim recites a computer-readable storage medium having computer-executable instructions that, when executed by a computer, performs a static to dynamic (S-to-D) Web address conversion method comprising (emphasis added):

- receiving a request for a dynamic Web page, wherein the request includes a ***static address pointing to the dynamic Web page***; and

- converting the static address to a ***dynamic address*** that also points to the ***dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper.

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Specifically, **Smith** does not teach "a *static address pointing to the dynamic Web page*," nor does it teach "a *dynamic address* that also points to the *dynamic Web page*." For at least this reasons, this claim is allowable.

Claim 54

This claim recites a computer-readable storage medium having computer-executable instructions that, when executed by a computer, performs a static to dynamic (S-to-D) Web address conversion method comprising (emphasis added):

- receiving a ***static address pointing to a dynamic Web page***;
- parsing the static address to identify at least one value associated with a field within the static address; and
- generating a ***dynamic address*** incorporating at least one value associated with the field, wherein the dynamic address points to the ***dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruh.cz** does not teach "a *static address pointing to a dynamic Web page*". Furthermore, **Smith** does not teach "generating a *dynamic address* incorporating at least one value associated with the field, wherein the dynamic address points to the *dynamic Web page*". For at least this reasons, this claim is allowable.

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Claim 55

This claim recites a computer-readable storage medium having computer-executable instructions that, when executed by a computer, performs a dynamic to static (D-to-S) Web address conversion method comprising (emphasis added):

- receiving a ***dynamic address*** pointing to a ***dynamic Web page***; and
- converting the dynamic address to ***a static address that also points to the dynamic Web page***.

In making out a rejection of this claim, the Office uses similar reasoning as used in regards to claim 1. For all of the reasons discussed above in regards to claim 1, Applicant respectfully submits that the rejection of this claim is improper. Specifically, **Pstruh.cz** does not teach "converting the dynamic address to *a static address that also points to the dynamic Web page*". Furthermore, **Smith** does not teach "receiving a *dynamic address* pointing to a *dynamic Web page*". For at least this reasons, this claim is allowable.

Claim 56

This claim ultimately depends upon independent claim 55. As discussed above, claim 55 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant requests that the Office withdraw the rejection of this dependent claim as it depends on an allowable claim.

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Conclusion

All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: 1·13·06 By: _____

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